

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HERMAN WILLIAMS,)	
)	Case No.: 23-CV-5945
Plaintiff,)	
)	Hon. Sunil R. Harjani
v.)	Hon. Mag. Daniel P. McLaughlin
)	
LUCIAN TESSMANN, et al.)	
)	
Defendants.)	JURY TRIAL DEMANDED

**DEFENDANT LAKE COUNTY’S UNOPPOSED MOTION FOR ADDITIONAL TIME
TO RESPOND TO PLAINTIFF’S SUPPLEMENTAL MOTION IN SUPPORT OF HIS
MOTION TO RECONSIDER**

Defendant Lake County, by and through its attorneys, The Sotos Law Firm, P.C., respectfully move this Court for an extension of time up to and including April 22, 2025, to respond to Plaintiff’s Supplemental Briefing in support of his Motion to Reconsider. In support thereof, Defendant Lake County states as follows:

1. On December 18, 2024, Plaintiff filed his motion for reconsideration of the Court’s order denying Plaintiff’s third request to amend his Complaint. (Dkt. 195.)
2. On January 24, 2025, Defendants Lake County, Village of Gurnee, and Kimberly Garofalo, as Independent Administrator of the Estate of Gregory Garofalo, Deceased filed their Response in opposition to Plaintiff’s Motion to Reconsider. (Dkt. 200.)
3. On March 19, 2025, in-person oral arguments were held on Plaintiff’s motion. The Court set a briefing schedule granting Plaintiff until April 2, 2025, to supplement the briefing consistent with the Court’s request and direction, and Defendants until April 16, 2025 to file a response. (Dkt. 208.)

4. Defendant Lake County now seeks a six-day extension of time to respond to Plaintiff's supplemental motion by Tuesday, April 22, 2025. This motion is not brought for the purpose of delay and good cause exists to grant the requested extension due to Defense counsel's current professional obligations, as Defense Counsel has been diligently preparing for the depositions of Defendants Pensala and Colin, scheduled for April 16 and April 17, respectfully.

5. Undersigned counsel for Defendant Lake County has communicated with Counsel for Plaintiff, Brian Eldridge, regarding the relief requested in this motion and he has no objection.

WHEREFORE, in light of the foregoing, Defendant Lake County respectfully requests until April 22, 2025, to file its response to Plaintiff's supplemental briefing in support of his motion to reconsider.

Date: April 16, 2025

Respectfully submitted,

/s/ Alexis M. Gamboa

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that on April 16, 2025, I electronically filed the foregoing **Defendant Lake County's Unopposed Motion for Additional Time to Respond to Plaintiff's Supplemental Motion in Support of his Motion to Reconsider** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed on the below Service List:

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